

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VALERIA TANCO and SOPHY
JESTY, IIPE DeKOE and THOMAS
KOSTURA, and JOHNO ESPEJO and
MATTHEW MANSELL,

Plaintiffs,

v.

WILLIAM E. "BILL" HASLAM, *et al.*,

Defendants.

Case No. 3:13-cv-01159

Judge Aleta A. Trauger

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND EXPENSES

As the representatives of the prevailing parties in this litigation, undersigned counsel Rubenfeld Law Office, PC, Holland and Associates, PLLC, Regina M. Lambert, the National Center for Lesbian Rights ("NCLR"), Sherrard & Roe, PLC ("Sherrard & Roe"), and Ropes & Gray LLP ("Ropes & Gray") (collectively, "Plaintiffs' Counsel"), respectfully move this Court under 28 U.S.C. § 1988 and other authority for an award of attorneys' fees, costs, and expenses. The attorneys' fees requested are \$2,333,095.63. Plaintiffs' Counsel respectfully requests that the Court also consider a fee enhancement in whatever amount this Court may deem appropriate to reflect the controversial nature of this case. Finally, the amount of costs and expenses to be reimbursed is \$65,555.37. As demonstrated in the supporting memorandum, which is incorporated by reference, the amounts requested are reasonable and justified by established law and indeed substantially understate the fees and expenses actually incurred.

Plaintiffs' Counsel reserve the right to seek additional fees and expenses and/or to forego the voluntary reductions applied in the fee petition in the event a reply brief, preparation for a hearing, or other compensable work becomes necessary in order to obtain a reasonable fee award for the work performed in this matter.

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system:

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